

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LORD ABBETT AFFILIATED FUND, INC.,
et al., Individually and On Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

NAVIENT CORPORATION, *et al.*,

Defendants.

C.A. No. 16-112-MN

Judge Maryellen Noreika

**LEAD PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT AND AUTHORIZATION TO PROVIDE NOTICE OF SETTLEMENT**

Lead Plaintiffs Lord Abbett Affiliated Fund, Inc., Lord Abbett Equity Trust – Lord Abbett Calibrated Mid Cap Value Fund, Lord Abbett Bond-Debenture Fund, Inc., and Lord Abbett Investment Trust – Lord Abbett High Yield Fund (collectively, “Lead Plaintiffs”), hereby move this Court, under Rule 23(e)(1) of the Federal Rules of Civil Procedure, for entry of an order: (i) preliminarily approving the proposed Settlement; (ii) approving the form and manner of providing notice of the proposed Settlement to Class Members; and (iii) scheduling a hearing to consider final approval of the Settlement and approval of the Plan of Allocation and Lead Counsel’s motion for attorneys’ fees and expenses. In support of this motion, Lead Plaintiffs submit the Memorandum of Law in Support of Lead Plaintiffs’ Unopposed Motion for Preliminary Approval of Settlement and Authorization to Provide Notice of Settlement, filed herewith, and the Stipulation and Agreement of Settlement dated November 16, 2021 (the “Stipulation”), attached hereto as Exhibit 1. The Parties’ agreed-upon [Proposed] Order Preliminarily Approving Settlement and Providing for Notice is attached hereto as Exhibit 2. Pursuant to the terms of the

Stipulation, this motion is unopposed by Defendants, and all Parties agree that the motion may be decided on the papers, subject to the Court's approval.

Dated: November 17, 2021

Respectfully submitted,

/s/ Christopher M. Foulds

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